

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

NICOLE TAYLOR REED,)
v.) CIVIL ACTION NO.
Plaintiff,) 2:06-CV-00380-MHT-CSC
BIG LOTS STORES, INC.,)
Defendant.)

DEFENDANT BIG LOTS STORES, INC.'S MOTION FOR EXTENSION OF TIME

Defendant Big Lots Stores, Inc. ("Big Lots"), by and through undersigned counsel, respectfully moves the Court for a brief extension of time, through and including March 16, 2007, in which to file its Motion for Summary Judgment.

In support of this Motion, Big Lots states as follows:

1.

Pursuant to the Court's December 8, 2006 Order, dispositive motions are due to be filed on or before February 28, 2007.

2.

Due to scheduling issues and obligations in other matters, counsel for Big Lots requests a short extension of time in which to submit its Motion for Summary Judgment.

3.

Counsel for Big Lots has spoken to Plaintiff regarding the requested extension, and she stated she has no objection to the requested extension.

4.

This Motion is being filed prior to the deadline for filing dispositive motions.

5.

The requested extension is not being made for any improper purpose or to delay or otherwise prejudice the rights of any Party.

6.

The requested extension will not delay the trial of this case, as this matter currently has not been set for trial.

THEREFORE, Big Lots respectfully asks the Court for a brief extension of time, through and including March 16, 2007, in which to file its Motion for Summary Judgment.

Respectfully submitted this 13th day of February, 2007.

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ATTORNEYS FOR DEFENDANT
BIG LOTS STORES, INC.

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CERTIFICATE OF SERVICE

I hereby certify I have served Plaintiff with the foregoing **DEFENDANT BIG LOTS STORES, INC.'S MOTION FOR EXTENSION OF TIME** by causing a copy to be sent via United States mail, first class, to:

Nicole Taylor Reed
1148 Barley Drive
Montgomery, AL 36111

This 13th day of February, 2007.

/s/ Joseph T. Carpenter
Joseph T. Carpenter
Alabama Bar No. 5114C59J